1 2 3 4 5 6 7 8	Randall T. Garteiser (CA State Bar No. 231821) rgarteiser@ghiplaw.com Christopher A. Honea (CA State Bar No. 232473) chonea@ghiplaw.com M. Scott Fuller (TX State Bar No. 24036607) sfuller@ghiplaw.com GARTEISER HONEA 795 Folsom St., Floor 1, San Francisco, CA 94107 119 W Ferguson, Tyler, TX 75702 Telephone: (415) 785-3762 Facsimile: (888) 908-4400 Attorneys for Plaintiff,		
9	CELLSPIN SOFT INC.		
10	IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION		
11			
12	CELLSPIN SOFT, INC.,	§	
13	Plaintiff,	\$ \$ \$ \$ \$ \$	PLAINTIFF'S UNOPPOSED MOTION TO STAY ALL DEADLINES
14	Fiamum,	8 §	INDEFINITELY
	v.	§ 8	
15		§ §	
16	FITBIT, INC.,	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	Case No. 4:17-CV-05928-YGR
17	MOOV, INC., NIKE, INC.,	8 8	Case No. 4:17-CV-05929-YGR Case No. 4:17-CV-05931-YGR
18	UNDER ARMOUR, INC.,	§	Case No. 4:17-CV-05932-YGR
	FOSSIL GROUP, ET AL.,	§	Case No. 4:17-CV-05933-YGR
19	GARMIN INTERN., INC., ET AL., and NIKON AMERICAS, INC.,	§ 8	Case No. 4:17-CV-05934-YGR Case No. 4:17-CV-05936-YGR
20		§ § §	
21	Defendants.	§	
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Plaintiff Cellspin Soft, Inc. respectfully submits this Unopposed Motion to Suspend All Deadlines in these matters Indefinitely.

The instant Motion is brought by Cellspin, and is unopposed by Defendants, in light of unique circumstances beyond the control of the parties. In short, certain of Plaintiff's experts, Dr. Garlick and Mr. Blok, are unavailable due to unforeseen conflicts, and the timeline for their renewed availability is uncertain at this time. The underlying details are set forth in the appended Declaration of M. Scott Fuller, which is attached as Exhibit A hereto. Due to privacy concerns, the appended Declaration will be submitted under seal.

In view of the circumstances, Plaintiff requests an Order Suspending all deadlines indefinitely, subject to the filing of a Status Report by Plaintiff within 30 days. It is Plaintiff's desire to provide the Court with an updated Agreed Proposed Amended Schedule at the time of the Status Report. Plaintiff agrees not to take the deposition of Defendants' experts after the current close of expert discovery, November 23, 2021.

Respectfully submitted,

Dated: November 12, 2021

GARTEISER HONEA

/s/ M. Scott Fuller

Randall T. Garteiser CA State Bar No. 231821 Christopher A. Honea CA State Bar No. 232473 M. Scott Fuller TX State Bar No. 24036607

Attorneys for Plaintiff Cellspin Soft, Inc.

CERTIFICATE OF SERVICE The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served via electronic mail on November 12, 2021 to all counsel of record. /s/ M. Scott Fuller M. Scott Fuller **CERTIFICATE OF CONFERENCE** The undersigned hereby certifies that the content of the foregoing document was discussed with opposing counsel, and all opposing consent to the filing and are unopposed to the relief sought herein. /s/ M. Scott Fuller_____ M. Scott Fuller